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An Assessment of the State of Connecticut's Mobility Counseling Program Updated May 2019

Introduction

Connecticut's tenant-based voucher programs are among the most segregated housing programs in the state.¹ Mobility counseling is a critical intervention for avoiding the perpetuation of segregation and affirmatively furthering fair housing and thus assists the state with state and federal fair housing act compliance in the administration of tenant-based voucher programs. Mobility counseling plays an important role in counteracting the numerous barriers that prevent housing voucher families from having genuine choices in where they live. Counselors assist families with learning about neighborhood benefits, particularly for neighborhoods previously unknown to families, becoming rent-ready with classes on responsible renter practices and money management, identifying and accessing available units in neighborhoods selected by families, acclimating to new communities, and ongoing support.

Federal courts in cases in Chicago, Dallas, Baltimore and elsewhere have consistently found that the desegregation required by the Fair Housing Act and other federal civil rights laws cannot be achieved without regional solutions that provide residents with real mobility to access housing in low poverty communities outside of center city areas. *See, e.g., Hills v. Gautreaux*, 425 U.S. 284 (1976) (Chicago); *Walker v. HUD*, 734 F. Supp. 1231, 1233-34, 1235-40 (N.D. Tex. 1989) (Dallas); *Thompson v. HUD*, 348 F. Supp. 2d 398, 523-24 (D. Md. 2005) (Baltimore). The remedies in these cases include tenant-based voucher programs with robust mobility counseling, which has proven to be a critical measure for ensuring that voucher programs operate in accordance with the federal Fair Housing Act. *See, e.g., Walker*, 734 F. Supp. at 1235, 1259 (discussing Dallas area mobility services required by consent decree); *Thompson v. HUD*, 1:95-cv-309-MJG, Doc. 876, Final Settlement Agreement (8/24/12) (continuing and expanding mobility program launched under *Thompson* partial consent decree with Housing Choice Vouchers and high-quality counseling for participating families). We believe a well-functioning mobility counseling program is similarly necessary in Connecticut.

¹ Erin Boggs and Lisa Dabrowski, *Out of Balance: Subsidized Housing, Segregation and Opportunity in Connecticut*, Open Communities Alliance, 2017, available at <http://www.ctoca.org/outofbalance>. This includes both the state of Connecticut's Rental Assistance Program (RAP), of which 94% of recipient households live in very low, low or moderate opportunity areas, and the cumulative total for the Housing Choice Voucher programs administered by all housing authorities in the state, including the program operated by the Department of Housing, of which 86% live in such areas.

This assessment reviews the performance of the state's Mobility Counseling Program. We find that the program is currently under performing and this is largely due to the formulation of the state contract. Additional contributing factors include a need for greater mobility-specific technical assistance for the selected mobility counseling agencies, a problematic process for connecting contractors to clients which may result in a recently-homeless client pool typically less prepared for a move to opportunity, and a failure to properly revisit and improve the contract once challenges became evident. We recommend the current contract be amended to reflect meaningful mobility counseling measures and extended for 3 months to allow for the issuance of a new RFP, open to national entities with mobility counseling expertise. We further recommend that a third party be invited to conduct a full review of the program allowing for a reformulation of the contract and "re-boot" of the program overall.

Connecticut's Mobility Counseling Program

In Connecticut, the state's Mobility Counseling Program, mandated by CGS Sec. 8-348, is available to participants in the federal Housing Choice Voucher (HCV) program administered by the Department of Housing (DOH) and the state-funded Rental Assistance Program (RAP)(collectively referred to as "housing voucher programs"). Significantly, mobility counseling is *not* available to HCV program participants who receive their vouchers through municipal housing authorities. Non-DOH voucher programs are responsible for 80% of the HCV households in the state.

We note that this assessment focuses on the formulation of the state's mobility program contract and does not address the general quality of the wider range of services provided by the program's contractors, the Council of Family Service Agencies and Home, Inc., which are well respected for the variety of poverty alleviation and affordable housing development work they each do respectively.

History of the Mobility Program

The state's mobility counseling program was created in 2002 in response to a proposed Request for Declaratory Ruling submitted to the Department of Social Services, which administered the state's Housing Choice Voucher and Rental Assistance programs at the time. The initial contractors were Home, Inc. in New Haven, the Housing Education Resource Center in Hartford, and Families Services Woodfield (now LifeBridge) in Bridgeport. For over a decade, these programs operated with insufficient funding and under a contract with weak performance outcomes. Not surprisingly, the Connecticut mobility counseling program fell far short of programs elsewhere in the country. Only 10% of program participants moved to areas with a non-Hispanic White population that represented that of the state as a whole or greater (72% and above).

In 2015, the legislature codified this settlement commitment by passing CGS Sec. 8-348, which mandates the support of a mobility counseling program in the state. This state law requires that the Department of Housing (DOH), "establish a residence mobility counseling program to assist individuals or families in relocating their residences to higher opportunity areas through

education and support services,” with “higher opportunity areas” being defined by specialized mapping published by DOH.

New Mobility Program Contracts

In 2015, at the end of the contract term for the original mobility contractors, a new request for proposals was issued by DOH, which now administers the housing voucher programs. According to the DOH Request for Proposals, applicants were limited to those who had a “principal place of business in Connecticut” (RFP, pg. 6) and organizations that had “a minimum of three (3) years of demonstrated experience with tenant education, *mobility counseling*, and housing search assistance” (RFP, pg. 1, emphasis added)

Two contractors were selected. The first, Home Inc., had previously administered the mobility counseling program in the New Haven area with less than optimal results, we believe caused by underfunding and insufficient contract demands. The second, the Connecticut Council of Family Service Agencies (CCFSA), had previously provided clients with search assistance, but had not engaged in mobility counseling as the term is generally understood among practitioners across the country. Work under the new contracts began on July 1, 2016, and continues through June 30, 2019.

Home, Inc. was awarded \$495,000 over 36 months, beginning July 2016, with the goal of serving 120 households, 25% of whom would move to higher opportunity areas. CCFSA was awarded \$584,000 over 32 months, beginning November 2016, with the goal of serving 150 households, 25% of whom would move to higher opportunity areas.

Program Performance

Data Challenges

We have endeavored to monitor the performance of the program. We have progress reports for CCFSA from DOH for January 2017 to June 2018 (missing 2 start up months, 11/2016 – 12/2016, six months in 2018, 6/2018 – 12/2018, and reporting for 2019, which is not yet due). CCFSA has kindly provided us with a summary of outcomes for the period from the beginning of the contract to the end of 2018. We have reports from DOH for Home Inc. from July 2017 to June 2018 (missing 12 months, 7/2016-6/2017, and 2019 reporting, which is not yet due).

There are a number of issues with contract reporting obligations and different interpretations by each contractor as to what should be reported, that make it difficult to measure and compare performance. A few examples include:

1. Each contractor defines “clients” in different ways. In some instances, CCFSA defines a household as a client once the agency has sent a letter informing the household of the availability of counseling services. In other instances, from what we can discern from the reports, for CCFSA a household is a client when it has received more detailed information from the agency. Home, Inc. considers a family a client when it has completed a Housing Needs Assessment. We recommend considering a household a

client when it has completed a needs assessment indicating an interest in making a move to a high or very high opportunity area.

2. The contract appears to anticipate that all voucher families will receive information about the availability of mobility counseling, which is important. It also appears to envision that 25% of families sent information will move to a higher opportunity area, which is unrealistic. Elsewhere in the country, programs typically find that 30-40% of families expressing an interest in moving to higher opportunity areas will be able to do so. Given the resources available to these programs, it is realistic for these two programs together to support 100 families moving to higher opportunity areas each year.

Performance Overall

Based on the available data, the program overall is not performing at an acceptable level. During the first 26 months of the contract, only 3 of CCFSA's 155 clients who completed a Housing Needs Assessment moved to a neighborhood with a higher opportunity ranking than their original home. It is unclear whether these clients moved to areas defined as "high" or "very high" opportunity as defined by the Department of Housing and required by the Mobility Counseling Program contract.

Home, Inc. also faced challenges. Between July 2017 and June 2018, 6 of Home, Inc.'s 61 clients who completed a Housing Needs Assessment moved a neighborhood with an opportunity rating higher than their original home. Only one client moved to a "high" or "very high" opportunity area as defined by DOH. It should be noted that these organizations are assisting other voucher families move, just not to higher opportunity areas. CCFSA assisted 21 households move and Home, Inc. reported 9 during the respective time periods above.

These results run counter to our experience with successful housing mobility programs in other parts of the country and our understanding of the desires of low-income families with vouchers. Indeed, in recent OCA surveys of Hartford families with vouchers or who qualify for vouchers, 45% to 68% indicate that they want to move to higher opportunity areas.

Assessment Item	CCFSA		HOME Inc.	
	Contract Target (32 months)	Actual Progress (through 26 of 32 months)	Contract Target (36 months)	Actual Progress (12 months of 36)
Outreach to All Voucher Holders	100%	1781*	100%	n/a
Moves to High or Very High Opportunity Area (per contract) **	25% (30 households)	? (Not noted in reports)	25% (38 households)	1
Moves to an Area with a Higher Opportunity Rating than Original Neighborhood		3 (or 2%)		6 (or 10%)
Households finding housing meeting all of their housing needs	20%	? (Not noted in reports)	20%	8 (13%)
Households finding housing meeting 50% of their needs	50%	21	50%	9
Households finding housing meeting their primary housing need	20%	20	20%	7
Clients Completing a Housing Needs Assessment	150	155	120	72

*Our interpretation of the contractor reporting is that this includes multiple outreach efforts including to the same household.

** The contract implies this percentage should be generated from the number of voucher holders receiving outreach, which is a problematic standard because the contract also implies that all voucher holders will receive outreach. The percentage listed here is of those voucher households completing a Housing Needs Assessment.

The Mobility Contract

If the central focus of the work of the mobility counseling agencies was, as it should be, to recruit and assist families interested in mobility moves to thriving communities, the mobility contracts themselves are much more adequately funded than they have been in the past and DOH should be commended for that. Theoretically, CCFSa receives \$3,893 per client expected to make a mobility move, and Home Inc. receives \$4,125 per such client. This is comparable to successful mobility programs, such as the Baltimore Housing Mobility Program, which costs approximately \$3,500 - \$4,500 per household that moves to opportunity. In the previous version of the state's mobility program, prior to 2015, the contractors received only \$1,300-1,700 per anticipated mobility move. Given this funding increase, the lack of performance is perplexing.

We believe that the central issue is the contract itself, which does not prioritize housing mobility counseling goals, as it was required to do by statute. The agencies under the contract are instead paid in part for plain "search assistance" for families (perhaps often including hard-to-house families) to move from one low income neighborhood to another.

Recommendations

We recommend three steps be taken:

1. DOH obtain the assistance of an outside party to conduct an in-depth review of Connecticut's program with the goal of recommending meaningful changes to bring the program into compliance with the mobility statute. An example of such an organization with mobility expertise is the Mobility Works technical assistance consortium – a group of experienced housing mobility practitioners from Baltimore, Dallas, Chicago, and DC.
2. DOH issue a new Request for Proposals incorporating the advice of the mobility expert to design the program and the contract.
3. Extend the current contract for the amount of time it takes to complete the RFP process, but amend it to reflect the advice of the mobility expert, ideally three months. This will enable the current contractors to keep their staff while demonstrating their ability to perform under a more meaningful contract.

This is an ideal time for such a program assessment and "reboot" because as a result of our successful litigation against HUD in *OCA v. Carson*, higher rent ceilings in the Housing Choice Voucher program in the Hartford region make moves to higher opportunity areas more realistic.

We recommend further that a program assessment consider the issues outlined below.

1. Contract Provisions

As discussed above, the contract provisions do not reflect an emphasis on mobility, but rather a focus on search assistance regardless of where client households would like to live. The upcoming contract should be rewritten in order to truly support families interested in mobility moves.

By way of example, as mentioned previously, under its contract CCFSa is anticipated to serve a total of 150 households. While 25%, or 37 clients, are expected to make mobility moves, the contractor is expected to assist 50%, or 75 clients, find housing that meets 50% or more of their identified housing needs – needs which may not necessarily include moving to a higher opportunity area. In other words, under this provision the contractor is obligated to assist 50% of clients move, period, regardless of location. Similarly, under the contract, another 20% of clients are expected to find housing that meets their primary housing need, which again may not be moving to a higher opportunity area. Taken together, the contract envisions that contractors will assist 70% of households move who may not necessarily even be trying to move to higher opportunity areas. These kinds of contract provisions convert a mobility counseling program into a search assistance program and divert the contractor's time and energy away from critical client outreach, landlord recruitment, direct assistance to families interested in making moves to higher opportunity areas, and important post-move counseling.

In reality, this contract is set up as a 75% search assistance/25% mobility contract. This element of the contract should be reformulated to comply with state law and focus on mobility.

There are also two key ways in which the contract can better define terms to ensure that DOH and the contractors are on the same page and reporting the same information.

- In the contract, define “higher opportunity areas” the way it is defined by CGS Sec. 8-348, that is, “high” and “very high” opportunity areas identified in the opportunity mapping used by DOH.
- As alluded to above, the contract needs to define the term “clients” in a uniform way that can be used by all contractors. We would recommend that a household become a “client” once a Household Needs Assessment is performed and the household has indicated an interest in working to move to a higher opportunity area.

2. Recruitment Methods

We recommend that outreach efforts in partnership with the state's voucher administrator contractor, D'Amelia and Associates be stepped up. We understand that currently D'Amelia shares lists of voucher holders with the mobility contractors three months in advance of the program participants' recertification. We recommend that this information be shared earlier – as much as a year in advance of recertification. This will allow for the kind of outreach essential to connect to interested families and undertake the education process critical to ensuring

families are mobility-move-ready, including training and assistance on credit repair, housing search, and neighborhood assessment.

In addition, DOH may want to revisit the kind of outreach happening during recertification and consider employing new strategies like texting and improved targeted messaging. It would be worthwhile to organize periodic trainings for D'Amelia's frontline staff on the mobility counseling program, messaging to voucher holders, and recruitment priorities. We want to ensure that families interested in mobility are referred to the program, not families that are facing challenges using their vouchers.

In addition, our understanding is that the mobility counseling agencies are not doing their own outreach apart from communications to the new voucher and recertification lists. Outreach efforts should be made working through other social service providers, many of whom have not heard of the program.

3. Landlord Recruitment

The mobility counseling program should include outreach to and education of landlords in high and very high opportunity areas about the Housing Choice Voucher and Rental Assistance Programs. The current contract includes no obligations to do so and the contractors are, understandably, not indicating in their periodic reports that they are engaging in such activities.

Having a pool of landlords ready and willing to accept mobility clients as tenants will help to facilitate more moves to higher opportunity areas. Our sense is that landlord recruitment needs to be more robust. This is a particularly important time to undertake such recruiting in the Hartford region where the ceiling on rents have increased due to the ruling in the *OCA v. Carson* case, meaning hundreds of units previously unattainable for HCV families are now within reach.

4. Security Deposits

We are grateful that DOH permitted the use of surplus program funds to be applied to security deposits for a period of the Mobility Counseling Program's operation. It is our understanding that those funds are now expended. We encourage such supports to continue to be available. As DOH has recognized and the mobility contractors agree, clients need this type of additional assistance in order to make mobility moves possible. Security deposits are often a major barrier for tenants hoping to move to higher opportunity areas. In a survey of Hartford-area Housing Choice Voucher holders, 39% of respondents stated that security deposits created issues for tenants in leasing their current home. The lack of a security deposit becomes an even greater barrier when voucher families seek to access higher opportunity units, which typically have higher rents and security deposit requirements. In a perfect world, the state's Security Deposit Guarantee program would be revamped and reopened, giving priority to mobility families. Other move assistance can also be beneficial, such as a stipend for moving expenses.

Tours of high opportunity neighborhoods should also be included in mobility counseling for clients who reach the point of a housing search. While time- and cost-intensive, they can greatly help families who may not consider communities with which they are not familiar.

5. Other Program Improvements

There are several additional steps we recommend be taken to improve the mobility counseling program. These include:

- a. A pool of mobility-dedicated Rental Assistance Program Certificates.
- b. Specialized exception rents for hard-to-reach neighborhoods.
- c. A flexible fund of around \$800 to \$1,000 per household available for the mobility counselors to allocate towards security deposits, application fees, moving expenses, credit checks, and other move-related expenses.
- d. Extended search periods for families participating in the Mobility Counseling Program.
- e. Expanded access to mobility services to all HCV recipients, including those who receive their vouchers through municipal housing authorities who currently do not have access to the program.
- f. Consider reestablishing the program as a pilot dedicated to serving the Hartford Metropolitan Statistical Area. This geographic focus will allow a contractor to hone the program within a set geographic space and also increase the likelihood of program success because it will be launched in an area using enhanced Small Area Fair Market Rents.
- g. Consider applying as a site for HUD's new \$25 million Mobility Demonstration, which may become available as soon as fall of 2019. More information available at <https://www.cbpp.org/sites/default/files/atoms/files/2-27-19hous-demolang.pdf>.

Conclusion

Connecticut has the opportunity to create a model mobility counseling program. While full support of the Connecticut housing mobility program is critical to the state's compliance with fair housing laws and the state statute authorizing the program, access to mobility assistance will also foster voluntary poverty de-concentration, empower voucher families' choices, provide a two-generation strategy for breaking the cycle of poverty, and contribute to the revitalization of our cities and the state's economy overall.